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Sent: Thursday, January 03, 2019 3:57 PM

To: Comments

Cc: Gardner, Suzy S.

Subject: FDIC RIN 3064-AE87-Real Estate Appraisals

Dear FDIC,

I believe the proposal about implementing the appraisal review provision needs to be clarified.

I do have questions about the scope of work required for these reviews and reviewer qualifications.

Will this require the reviewer to do his own research, or is it limited to what is in the report? Does the data in the report need to be verified? Will the reviewer need to determine if the value conclusion reasonable? Or, would determining if the value is supported be sufficient?

Will the reviewer need to be a licensed appraiser? I do have some concerns about USPAP review requirements. Could the review be done by an underwriter who is not considered part of loan production?

Clarification is needed on the review requirements because it may impact staffing requirements.

Thank you,

Dwight Tokuda

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